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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Shoman Za Washington, Jr., individually)	Case No. 2:22-cv-01400-APG-VCF
and on behalf of all others similarly)	
situated,) Joint Stipulation and Order for
) Extension of Time to Respond to Class
Plaintiff,) Action Complaint
)
vs.) <i>Second Request</i>
)
Phoenix Financial Services, LLC,) Current Response Date: Dec. 21, 2022
) New Response Date: Jan. 4, 2023
Defendant.)
)

Joint Stipulation for Extension of Time

1 It is hereby stipulated by Plaintiff Shoman Za Washington, Jr. and Defendant
2 Phoenix Financial Services, LLC (“PFS”), through undersigned counsel, that PFS
3 may have a second extension of time to respond to the Class Action Complaint from
4 December 21, 2022, through and until January 4, 2023. This stipulation is made
5 with respect to the following:
6

7
8 1. Plaintiff filed this action on August 29, 2022 in the United States
9 District Court for the District of Nevada.
10

11 2. PFS was served on November 16, 2022, making the original response
12 due date December 7, 2022.
13

14 3. On December 6, 2022, the parties agreed to a 14-day extension of time
15 for PFS to respond to the Complaint through, and until December 21, 2022.
16

17 4. Additional time is needed for defense counsel to evaluate the
18 information necessary to respond to the Complaint. The parties also intend to
19 discuss potential early resolution of this claim.
20

21 Granting this request for an extension of time to respond to the Complaint
22 will neither prejudice any party nor unreasonably delay the litigation.
23

24 IT IS SO STIPULATED.

25 Dated: 12/21/2022

CONTEMPORARY LEGAL SOLUTIONS

26 /s/Robert M. Tzall
27 Robert M. Tzall
28

1 Attorney for Plaintiff
2 Shoman Za Washington, Jr.

3
4
5 Dated: 12/21/2022

SESSIONS, ISRAEL & SHARTLE, LLP

6 /s/James K. Schultz

7 James K. Schultz

8 Attorney for Defendant

9 Phoenix Financial Services, LLC

10
11 Pursuant to the Parties' joint stipulation, IT IS HEREBY ORDERED:

12
13 Defendant shall have an extension of time to and including January 4, 2023,
14 to respond to the Complaint.

15 Dated: 12-22-2022

16 
17 _____
18 United States Magistrate Judge